PHASE I ENVIRONMENTAL ASSESSMENT INSPECTION REPORT, PERMIT BY RULE AND CONDITIONALLY AUTHORIZED FACILITIES

AMENDED JANUARY 28, 2003

FACILITY NAME: Foss Plating Company
EPA ID NUMBER: CAD008278236

PHYSICAL ADDRESS: 8140 West Secura Way
Santa Fe Springs, CA 90670

FACILITY CONTACT: Mr. Victor Foss, President

TELEPHONE: (562) 945-3451

SITE VISIT DATE: 8/22/2002

REPRESENTATIVES PRESENT:

Victor Foss, President, Foss Plating

Randy Foss, Vice President Sales, Foss Plating

Irena Edwards, Hazardous Substances Scientist, Department of Toxic Substances Control (DTSC)

Richard Kallman, Santa Fe Springs Fire Department, Health Hazardous Materials Division

CONSENT GIVEN BY: Mr. Randy Foss

PURPOSE: The purpose of the site visit was to verify information submitted in the DTSC Further Investigation Questionnaire Checklist dated July 22, 2002, and the Phase I Environmental Assessment Checklist (Checklist) dated

12/1/2000.

Facility Information:

Current Owner/Operator: Foss Plating Company, incorporated in 1959 by Victor F. Foss, Stanley W. Foss and Donald F. Foss. A transfer of ownership was started in 1993 by Victor E. and Ronald A. Foss and Randall A. Foss.

Previous Operators: Undeveloped land prior to 1959.

Past Activities: Plating and polishing.

Facility Current Status:

Two active Conditionally Authorized waste water treatment units.

Waste streams being generated:

Spent rinses from plating operations containing nickel, chromium, acids, and bases. Sludge containing metals.

Volume of Waste :
Treated per month: 120,000 - 150,000 gallons of waste water

Manifested offsite:

11 tons of metal sludge in 2002.

17.9 tons of metal sludge in 2001.

42 tons of metal sludge in 2000.

The last 1.3 tons of 1,1,1-trichloroethane were manifested out in 1995.

Treatment Disposal methods:

Acid/base neutralization, metals precipitation, hexavalent chromium ion exchange, hexavalent chromium reduction, and sludge drying.

Hazardous Materials Storage:

Main building number 8140, where plating operations take place has cement floor and is divided into several bermed containment areas. The open air hazardous materials storage area is asphalted. Five above ground waste water accumulation, treatment, and six chemical storage tanks are secondary contained. A portion of the wastewater treatment system is under ground. The under ground system consists of approximately 7-10 cement, 5'6" feet deep tanks and a three stage clarifier.

Summary of Reports:

Foss Plating Co. submitted the following reports to DTSC:

- Phase I Environmental Assessment Checklist (Checklist) dated 12/1/2000. The Checklist recommended exemption.
- DTSC Further Investigation Questionnaire dated 7/22/02 and attachments.

Based on DTSC's review of these reports, Foss Plating began operations at 8140 Secura Way in the 1960's. Operations included still polishing and chrome plating. During the course of the years several buildings at Secura Way were occupied by Foss Plating, mainly for materials storage and polishing. In 1985, Tetrachloroethene was replaced with 1,1,1-Trichloroethane and other solvent cleaners. Foss Plating discontinued the use of solvents in 1995 and switched to aqueous cleaners. In 1988, the use of Cyanide stripping agents was discontinued. Underground clarifier system for plating wastewater treatment was installed in 1979. The system was constructed of cement tanks. In 1993, Foss Plating applied to DTSC for a Tiered Permit for the waste water treatment system.

In 1989, Clayton Environmental conducted a phase I environmental assessment of the facility. A portion of the Clayton report submitted for DTSC review stated there was no evidence of past spillage noted within the facility or near the spill containment drain. In 1998/1999, Foss Plating conducted a limited shallow soil sampling for halogenated volatile organics, nickel, and chromium in front of the building in the Blacktop area and the wastewater treatment area. Western Analytical Report dated 3/09/99 reported elevated concentrations of Tetrachloroethene (48 ug/kg), chromium (97.3 mg/kg), and nickel (301 mg/kg).

Los Angeles County Sanitation District letter dated 9/14/1998 informed Foss Plating of being out of compliance with the District's spill containment requirements. In particular, the letter cited breached sulfuric acid tank double-wall containment in the wastewater treatment area, damaged spill containment berm in the plating tank area, and storage

of acids and bases in the same spill containment area.

In 2001, Los Angeles Regional Water Quality Control Board (LARWQCB) inspected Foss Plating for compliance with the NPDES General Permit for Storm Water Discharges Associated with Industrial Activity. In a Notice to Comply dated 3/6/2002, LARWQCB stated "General housekeeping practices needed to be improved." LARWQCB was concerned that faulty housekeeping could contribute pollutants to storm water discharge drain located in front of the facility on Secura Way.

The City of Santa Fe Springs Fire Department CUPA requested Foss Plating to complete an integrity assessment and/or replacement of the below grade wastewater treatment system in 2002.

A review of the submitted "Log of Spills and Cleanup" indicated Foss Plating allowed most releases to air dry. Then the residue was swept and fed into the sludge dyer.

SITE WALKTHROUGH:

I arrived at the facility at approximately 9:30am. Mr. Randy Foss gave me the consent to inspect the facility. Later Mr. Victor Foss arrived at the facility and accompanied me for the rest of the inspection.

The main facility building number 8140 was about 9,200 square foot. The building housed the company offices and production area. The northwest portion of the building was used as office space. The remainder of the building housed nickel and decorative chrome plating operations. The nickel and decorative chrome plating lines consisting of several large open-top above-ground tanks were located along the eastern wall of the building. Tanks rested on a cement floor and were contained within a six inch tall berm. I did not observe any chemical resistant, protective coating on the cement. I observed the walkway around the plating line was constructed of wood covered with carpet. The carpet was soaked with plating solutions. In addition to the decorative chrome and nickel plating lines, I observed cleaning and stripping tanks containing acids, bases, and a rust inhibitor dip containing arsenic. I observed chemical residue on the floor. Chromic acid treatment system, and a carbon treatment vat and filter system for the nickel plating solution occupied the remaining floor. I observed a pool of nickel solution on the floor around the carbon treatment/filter system. Mr. Victor Foss stated it was not a problem since the carbon treatment/filter system was inside a berm. I observed collection trenches and sumps located within the bermed areas. The sumps were approximately 4' deep. The sumps were pumped out periodically via the above ground lines to the wastewater treatment system located in the front yard of the building along the Secura Way. I observed a vapor degreaser by the wall separating building number

8140 from building 8200. According to Mr. Victor Foss, the degreaser was not in operation. An underground vault was located in front of the vapor degreaser. Mr. Victor Foss stated that the 4' deep vault was used for storing the nickel anodes.

Building number 8200 housed polishing operations. In front of the building I observed several aboveground chemical storage tanks and a filter press. The tanks were contained inside a concrete secondary containment. Mr. Victor Foss stated a sample of the soil was collected and analyzed prior to the installation of the concrete pad following LARWQCB direction. No significant contamination was detected.

The spent acid collection tank, spent cleaner collection tank, reduced chrome collection tank, mixing tank, pH adjusting and settling tanks, and a three stage clarifier were located below ground, in front of the building number 8140. According to Mr. Victor Foss, they tried to transfer waste water treatment from the underground tank system to the above ground tank system (Lallmela), but could not make it work.

I observed chemical, hazardous waste, and plating racks storage inside building 8141, and inside the fenced yard between buildings 8143 and 8145. Mr. Victor Foss stated building 8143 housed general storage and polishing operations in the past. Buildings 8154 and 8147 were occupied by Foamex and Universal Finishing companies at the time of the inspection. Mr. Victor Foss stated Foss Plating had previously occupied buildings 8154 and 8147, which were the previous chemical and hazardous waste storage.

Discussion With Management:

Mr. Victor Foss stated that maintenance/house keeping at the facility were affected by the cut backs in personnel. He stated Ms. Carol was more knowledgeable about the facility environmental compliance issues and suggested I follow up with her about any unanswered questions. I stated a copy of DTSC inspection report will be provided to Foss Plating and to the City of Santa Fe Springs Fire Department CUPA.

AREAS OF CONCERN:

Degreaser Operations Area

Wet Floor Area

Underground clarifier/wastewater treatment system.

CHEMICALS OF CONCERN:

Solvents (Tetrachloroethene, 1,1,1-Trichloroethane (1,1,1-TA), Methylene Chloride)

Chromium, Nickel, Lead, Arsenic, Cyanide

CONCLUSION:

Based on the review of the submitted reports and the August 2002 inspection of the facility by DTSC, the facility was not operated and maintained to prevent releases in violation of the California Code of Regulations (Cal. Code Reg.), Title 22, §66265.31. There was evidence of chromium, nickel and Tetrachloroethene releases to the soil in the shallow soil samples collected outside the production building. DTSC recommends Foss Plating to conduct facility further investigation. Facility further investigation must include collection of soil samples inside the production building in the vicinity of the degreaser and in the wet floor areas impacted by the releases from the plating lines 1 and 2, nickel carbon treatment/filter, and metal stripping.

The underground wastewater treatment system was in operation since the seventies and has not been assessed for integrity in violation of the Cal. Code Reg., Title 22, §66265.191. DTSC will defer its decision regarding the need for further investigation of the operating underground wastewater treatment until after the unit is removed from service and is closed according to the Cal. Code Reg., Title 22, §67450.3(c)(11). In the interim DTSC will refer Foss Plating to the Santa Fe Springs Fire Department for the enforcement of Cal. Code Reg., Title 22, §66265.191 and §66265.31.

Irena Edwards
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